

DECLARATION OF MATTHEW CHRISPIN

1. I, Matthew Chrispin, pursuant to 28 U.S.C. §1746, declare the following testimony is true and correct based upon my own personal knowledge.
2. I am a Defendant in *John and Jane Doe No. 1, et al. v. Bethel Local School District Board of Education, et al.*, U.S. District Court, S.D. Ohio Case No. 3:22-cv-00337, named in my official capacity only.
3. I am employed by the Bethel Local Schools Board of Education as its Superintendent from August 1, 2022 until present. In addition to my work experience at Bethel Local Schools Board of Education, my public-school experience includes 32 years.
4. All statements made in this Declaration are made in my official capacity as the Superintendent for the Bethel Local Schools Board of Education, which educates students grades kindergarten through twelve.
5. A certified, true and correct copy of select policies adopted by the Board of Education and School District documents are filed on record in this action through Fiscal Officer Tina Hageman. Some of these policies and documents are referenced in this Declaration by their bates numbers, "BOE 1-276".
6. On Monday, August 15, 2022 at 8:30 a.m. High School Principal Swope and I meet with Anne Roe and her parents, Joanne and John Roe¹. The meeting is held in the High School Principal's Office. Anne's parents request the meeting to confirm the accommodation granted during the 2021-2022 school year while attending Bethel Junior High would remain in place during the 2022-2023 school year regarding Anne's use of the communal girls' restroom. Principal Swope and I know Anne to be a transgender girl entering the High School as a ninth grader at the time of this meeting. Principal Swope and I confirmed for the Roe family the accommodation remains in place unless School District legal counsel advises otherwise. Otherwise, I recall Anne Roe telling me during the 2021-2022 school year she is provided a separate, segregated place to change for physical education class.
7. The communal restrooms throughout the School District have partitioned stalls for privacy. All schools are housed on one campus in one building. If people improperly enter communal restrooms, locker rooms, or intimate space, the school hallways are equipped with security video cameras which would aid in the investigation of any such complaint.
8. I have received no complaints from any student regarding any transgender student related to any issue.

¹ Counsel for Proposed Intervenor student Anne Roe/parent Joanne Roe file a motion to proceed pseudonymously on their behalf.

9. To date, I have had two meetings with parents who have objected to transgender students' use of communal restrooms aligning with their sexual identity. The parents raised religious, safety, and privacy concerns but lodged no specific incidents complaining on behalf of their respective students.
10. Other than Anne Roe's request for accommodation to use the girls' communal restroom, from school year 2019-2020 to the present, based upon investigation and discussion with my administrative staff, the School District receives no other requests for accommodation from or on behalf of a transgender student to use the communal restrooms or any other intimate space aligning with their sexual identity, such as locker rooms.
11. In recognition of the needs of all Bethel Local Schools students, single stall restrooms are made available to all students in school year 2019-2020 to present. Parents and students are made aware of this at the beginning of each school year and instructed on how to request access to signal occupancy restrooms. True and accurate copies of maps of the Elementary, Middle and High Schools show where each communal and single use restroom are located as well as any other intimate space, such as locker rooms. BOE 399. I added the green markings to the maps to make identification of these spaces readily known. BOE 400. These maps are being filed under seal as confidential documents because they are not public records, critical to school security.
12. This school year, at present, only eight students have requested use of the single use restrooms in the School District.
13. The entire School District is over-crowded – the restrooms, library, and cafeteria alike. Therefore, the facility is currently under renovation constructing a new building. The student population increases each year for the last six years, averaging 94 new students per year. From the end of May 2022, 197 new students enrolled in the School District, including 70 Ukraine refugees.
14. As part of my job duties as Superintendent, I must be familiar with all Board Policy. Board Policy for school years 2019-2020 to the present is written and contained in the Policy Manual. The current Policy Manual is accessible at:
<https://go.boarddocs.com/oh/bethlsd/Board.nsf/Public?open&id=policies>. All Board of Education adopted policy related to transgender students' rights to use communal restrooms is contained in the Policy Manual.
15. Board Policy 5517 Student Anti-Harassment (BOE 220-245) is the Board Policy administration applies, as advised by Board of Education legal counsel, to continue to grant the accommodation requested on behalf of Anne Roe. If a transgender student requests locker room access accommodation aligning with his/her sexual identity, a single use restroom will be assigned to the student for use as the locker rooms do not presently have any private changing areas.

16. The School District student population is diverse. The Board of Education Policies acknowledge free exercise of religion and separation of church and state within the context of student rights, and in other contexts. (po1200, 1220, 1422, 1662, 2240, 2260, 2270, 2416, 3122, 3210, 3362, 4122, 4210, 4362, 4430, 5112, 5120, 5136, 5136.01, 5200, 5223, 5320, 5330, 5517, 5730, 8330, 8450.01, 8800, 9700 and 9700.01). The School District abides by the Ohio Learning Standards which require curriculum and learning on the five major religions. BOE 347-393. Board Policy also governs school clubs. BOE 105-106, 246. Currently in the High School, in addition to many other clubs, Fellowship of Christian Athletes and Gay-Straight Alliance are offered to students.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "M.W. Chrispin", is written over a horizontal line.

Matthew Chrispin
Bethel Superintendent of Schools

January 9, 2023

Date